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11 *Attorneys for Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans*
12 *Servicing, LP*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 BANK OF AMERICA, N.A., AS
16 SUCCESSOR BY MERGER TO BAC HOME
17 LOANS SERVICING, LP,

18 Plaintiff,

19 vs.

20 NORTH AMERICAN TITLE INSURANCE
21 COMPANY, DOE INDIVIDUALS I through
22 X; and ROE CORPORATIONS XI through
23 XX, inclusive,

24 Defendants.

Case No.: 2:21-cv-00415-KJD-VCF

25 **STIPULATION AND ORDER TO**
26 **EXTEND DEADLINE TO FILE A**
27 **~~PROPOSED~~ DISCOVERY PLAN**

28 **(First Request)**

Plaintiff, Bank of America, N.A. as Successor by Merger to BAC Home Loans Servicing, LP (“BANA”) and Defendant, North American Title Insurance Company (“NATIC”), by and through their undersigned counsel, stipulate and agree as follows:

1. On March 9, 2021, BANA filed its Complaint in Eighth Judicial District Court, Case No. A-21-830782-C [ECF No. 1-1];
2. On March 11, 2021, NATIC filed a Petition for Removal to this Court [ECF No. 1];
3. On November 8, 2022, the Parties filed a Joint Status Report advising the Court that the Parties attended a private mediation on September 29, 2022, which did not result in settlement. The Parties requested thirty (30) days to submit their proposed discovery plan [ECF No. 14];

- 1 4. BANA's counsel has been unavailable due to a recent Ninth Circuit oral argument and in
2 light of the upcoming holidays, the Parties are requesting an additional thirty-two (32)
3 days, through and including January 9, 2023, to file their proposed discovery plan;
4 5. Counsel for NATIC does not oppose the requested extension;
5 6. This is the first request for an extension which is made in good faith and not for purposes
6 of delay.

7 **IT IS SO STIPULATED.**

8 DATED this 8th day of December, 2022.

DATED this 8th day of December, 2022.

9 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

10 /s/ Lindsay D. Dragon, Esq.

/s/ Kevin S. Sinclair, Esq.

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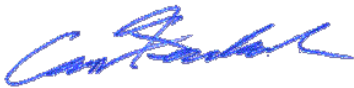
Attorneys for Defendant, North American

N.A. as Successor by Merger to BAC Home

Title Insurance Company

Loans Servicing, LP

16
17 IT IS SO ORDERED.

18 

19 Cam Ferenbach

20 United States Magistrate Judge

21 DATED 12-9-2022